

State Registration Number

N2407

## RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-N2407-  
2021

**FEBRUARY 8, 2021 - STAFF REPORT ADDENDUM**

### **Purpose**

A Staff Report dated October 26, 2020, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 45-Day EPA comment period as described in Rule 214(3). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

### **General Information**

Responsible Official:	Kyung Kho, Midwest Area Environmental Manager 708-297-3949
AQD Contact:	Matt Deskins, Environmental Quality Analyst 269-303-8326

### **Summary of Pertinent Comments**

The following pertinent comments were received during the 45-Day EPA comment period.

The EPA recommends that the EGLE-AQD revise the dual authority citations to both 40 CFR 60 Subpart WWW and 40 CFR 63 Subpart AAAAA included within the permit. In particular, the requirements citing 40 CFR 63.1955(a)(1) do not currently refer to a condition within 40 CFR 63 Subpart AAAAA.

I recommend that these provisions cite either 40 CFR 63.1930 or 40 CFR 63.1955(a), as appropriate.

### **Changes to the December 4, 2020 Proposed ROP**

#### **Under EULANDFILL**

All Underlying Applicable Requirements (UARs) Citations of 40 CFR 63.1950, 63.1955, or 63.1955(a)(1) were changed to 40 CFR 63.1930(a) to reflect the updated MACT AAAAA.

Under #1 of the Process/Operational Restrictions, the UARs cited in the condition language were changed from 63.1955(b) to 63.1955(a) and 63.1980 changed to 63.1975. Also, the UAR listed after the condition was changed from 63.1945(d) to 63.1930(a).

Under #5 of the Monitoring/Recordkeeping Requirements, the UARs cited in the condition language were changed from 63.1955(c) to 63.1955(b) and 63.1980(c) through (f) was changed to 63.1982(a) and (b). Also, the UAR listed after the condition was changed from 63.1980(g) to 63.1982(c).

Under #6 of the Reporting Requirements, the UARs 63.1955(c) and 63.1980(a) after the condition were deleted.

### **UNDER EUACTIVECOLL**

All Underlying Applicable Requirements (UARs) Citations of 40 CFR 63.1955(a) were changed to 40 CFR 63.1930(a) to reflect the updated MACT AAAA.

Under #3(a) of the Process/Operational Restrictions, the UAR 63.1980(a) after the condition was deleted.

Under #4 of the Reporting Requirements, the UAR 63.1980(a) after the condition was deleted.

Under #4 of the Other Requirements, the UAR 63.1960 after the condition was changed to 63.1964(a).

### **UNDER EUEVAPSYS**

All Underlying Applicable Requirements (UARs) Citations of 40 CFR 63.1955(a) were changed to 40 CFR 63.1930(a) to reflect the updated MACT AAAA

Under #4(b)(i) and (ii), the UAR 40 CFR 63.1980(a) was deleted.

### **UNDER EUOPENFLARE**

All Underlying Applicable Requirements (UARs) Citations of 40 CFR 63.1955(a) were changed to 40 CFR 63.1930(a) to reflect the updated MACT AAAA

Under #4 and #4(a),(b), and (c), the UAR 40 CFR 63.1980(a) was deleted.

Under #2 of the Other Requirements, the UAR 40 CFR 63.1960 was changed to 63.1964(a).

### **APPENDICES**

Under Appendix 7, changed the applicable UAR from 40 CFR 63.1955(c) to 63.1962(a)(3)(ii).

Under Appendix 7, deleted the UAR 40 CFR 63.1955(a) where it's non-applicable now.